Amdt. dated August 25, 2005
Reply to Office action of June 9, 2004

Serial No. 09/398,378
Docket No. BO999030
Firm No. 0036.0044

REMARKS/ARGUMENTS

Claims 1-3, 5-15, 17-27, and 29-36 are pending in the application. Claims 1, 7, 13, 19, 25, and 31 have been amended. Claims 4, 16, and 28 have been cancelled. Reconsideration is respectfully requested. Applicants submit that the pending claims 1-3, 5-15, 17-27, and 29-36 are patentable over the art of record and allowance is respectfully requested of claims 1-3, 5-15, 17-27, and 29-36.

Applicants would like to thank Examiner Diaz for holding a telephone interview with their representative, Janaki K. Davda, on Tuesday, August 23, 2005, at 1:00 p.m. EST. Claim 1 and the Stuart patent were discussed. It was discussed that the use of "triggers" in the claimed invention refers to a trigger in a database, and the claims have been amended to clarify this element. Applicants are also providing a definition of "triggers" with this amendment. Applicants' representative also agreed to further clarify the claims.

In paragraph 4, the Office Action rejects claims 1-36 under 35 U.S.C. 102(e) as being anticipated by Stuart (U.S. Patent No. 6,466,935). Applicants respectfully traverse these rejections.

Applicants respectfully submit that the Stuart patent does not describe the claimed use of event triggers.

Claim 1 describes generating, with a computing system, a signal when status for the job is changed from a first status to a second status in a job status table, and the signal is generated by an event trigger in a database at the computing system that is invoked in response to the change in status of the job in the job status table. In addition, claim 1 describes that a user defined function identifies using a mapping a single work process for processing the job based on the second status, wherein the user defined function is invoked by the event trigger. Applicants' Specification, for example, at page 6, lines 17-25 describe that embodiments utilize a database trigger to notify the UDF. In particular, an after trigger is an object in the database that is

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invoked indirectly by the database manager when a particular SQL statement is completed, and an instance of an SQL statement updating or inserting the status to the job status table invokes a trigger event to activate the trigger that, in turn, executes the user defined function (UDF). Also, Applicants' Specification at page 7, lines 8-11 describe that the updating or setting of the status in the job status table is a triggering event that activates the job status trigger, which then executes the UDF. Moreover, Applicants are attaching Exhibit A with a definition of a trigger printed from http://www.webopaedia.com/TERM/t/trigger.html on August 23, 2005, which describes that a "trigger is a SQL procedure that initiates an action (i.e., fires an action) when an event (INSERT, DELETE or UPDATE) occurs" and that "the DBMS automatically fires the trigger as a result of a data modification to the associated table".

Moreover with the use of event triggers, there is no need to poll the job status table at intervals as the event triggers cause the signaling of the workers to process a job, thus utilizing a "push" versus a "pull" approach to workflow management and processing (e.g., Specification, page 11, lines 15-18). On the other hand, the Stuart patent describes that the WFMS retrieves the highest priority work item by *querying or polling* the relational database tables (Col. 4, lines 41-43).

The Examiner further submits that the WFMS must know when to query the relational database for another job and that "the WFMS must somehow be notified of the status change and next assigned work process." Applicants respectfully submit that anticipation requires that the identical invention must be shown in a single reference in as complete detail as is contained in the claims. Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). It is not enough for the Examiner to indicate that the "WFMS must *somehow* be notified" [emphasis added] to anticipate the claimed invention.

The Examiner further submits that there are no temporal constraints imposed by the claim language. Applicants respectfully submit that the job is processed in a just-in-time manner (e.g., Applicants' Specification, page 2, lines 22-28; page 11, lines 7-9). That is, a job enters the workflow system by having its status set to the first possible status value, and setting the status

triggers an event which signals a worker process associated with the status to process the job. Then, after the job is processed, the worker process updates the status to an output status which triggers another event signal to another worker process associated with the output status to proceed with processing the job. In this way, a change in the status of the job drives the workflow environment to provide a just-in-time type system for processing jobs using database technology.

Thus, claim 1 is not anticipated by the Stuart patent. Independent claims 7, 13 19, 25, and 31 are not anticipated by the Stuart patent for at least the same reasons as were discussed with respect to claim 1.

Dependent claims 2-3, 5-6, 8-12, 14-15, 17-18, 20-24, 26-27, 29-30, and 32-36 incorporate the language of independent claims 1, 13, and 25, respectively, and add additional novel elements. Therefore, dependent claims 2-6, 8-12, 14-18, 20-24, 26-30, and 32-36 are not anticipated by the Stuart patent for at least the reasons discussed with respect to independent claims 1, 13, and 25.

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Conclusion

For all the above reasons, Applicants submit that the pending claims 1-3, 5-15, 17-27, and 29-36 are patentable over the art of record. Applicants have not added any claims. Nonetheless, should any additional fees be required, please charge Deposit Account No. 09-0466.

The attorney of record invites the Examiner to contact her at (310) 553-7973 if the Examiner believes such contact would advance the prosecution of the case.

Dated: <u>August 25, 2005</u>

By: _____

Janaki K. Davda
Registration No. 40,684

<u>Please direct all correspondences to</u>:

David Victor
Konrad Raynes & Victor, LLP
315 South Beverly Drive, Ste. 210
Beverly Hills, CA 90212
Tel: 310-553-7977
Fax: 310-556-7984

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EXHIBIT A

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